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Attorney for Plaintiff Gregory Anderson

UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF CALIFORNIA
SAN JOSE DIVISION

GREGORY ANDERSON, an individual,
Plaintiff,
vs.
YAHOO!, INC., a Delaware corporation,
Defendant,

CASE NO. 5:16-cv-00527-RMW

ADMINISTRATIVE MOTION TO
CONSIDER WHETHER CASES SHOULD
BE RELATED

Plaintiff Gregory Anderson brings this Administrative Motion To Consider Whether Cases Should Be Related pursuant to Civil L.R.s 3-12 and 7-11.

1. Title and Case Number of the Apparently Related Case

Scott Ard v. Yahoo!, Inc., Case No. 5:16-cv-05635-NC

2. Brief Statement of the Relationship

The Ard v. Yahoo case and the current case share the same Defendant employer and allege the same wrongful gender-based discrimination and WARN Act violations, with the Plaintiffs' terminations occurring within months of each other. Plaintiff Scott Ard was the manager and supervisor of Plaintiff Gregory Anderson. The complaints in the two cases share a substantial number of allegations and the same causes of action.

1 Plaintiff Ard was a participant in, and witness to, Plaintiff Anderson's employment
2 performance and termination. The two Plaintiffs allege they were the target of discriminatory
3 treatment by the same actors and were both targeted and terminated through the mis-
4 application of Defendant's Quarterly Performance Review ("QPR") process.

5 The documentary discovery required to prove one case will be required and
6 applicable to prove the other case. The depositions in one case will be required and
7 applicable to the other case. The cases should be related and consolidated for purposes of
8 discovery. Without relation and consolidation the parties will engage in substantial and
9 costly duplicative discovery.

10 Moreover, the parties have not yet brought any discovery issues before the Court.
11 Discovery orders in the two cases should be coordinated to avoid conflicting results and
12 essentially duplicate motions.

13 For the above reasons the cases of Ard v. Yahoo and Anderson v. Yahoo should be
14 found to be related cases under Local Rules 3-12.

15 Dated: October 5, 2016

Respectfully submitted

16 JON R. PARSONS LAW FIRM

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18 
19 by Jon R. Parsons
Attorney for Plaintiff Anderson

PROOF OF SERVICE

I, the undersigned, do hereby declare that I am 18 years or age or older, am not a party to the above matter, and am employed in the Jon R. Parsons Law Firm. On October 5, 2016, I served a copy of the following documents

ADMINISTRATIVE MOTION TO CONSIDER WHETHER CASES SHOULD BE RELATED on the parties herein by placing a true copy of each such document in a sealed envelope addressed as follows:

Name / Address

Representing

Amelia L. Sanchez-Moran, Esq.
Morgan, Lewis & Brokious
One Market, Spear Street Tower
San Francisco, CA 94105-1596

Defendant Yahoo!, Inc.

☒ served by MAIL: by depositing the envelope, first class postage prepaid, with the United States Postal Service at Palo Alto, California.

☐ served by FEDERAL EXPRESS: by depositing the envelope with the Federal Express company at Palo Alto, California and arranging for payment of shipping costs.

☐ served PERSONALLY: by delivering the envelope by hand to the office or person of the addressee.

☒ served by e-mail transmission by attaching a .pdf document copy to an email addressed to the following person and address:

amelia.sanchez-moran@morganlewis.com
melinda.rieichert@morganlewis.com

I declare under penalty of perjury of the laws of the State of California that the foregoing is true and correct. Executed on October 5, 2016, at Palo Alto, California.


Jon R. Parsons